



September 22, 2020

BY ECF

Hon. Raymond J. Dearie
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Bebars Baslan*, 13-Cr-220 (RJD)

Dear Judge Dearie:

I was recently retained by Mr. Baslan, and I respectfully request permission to file a supplemental brief in support of Mr. Baslan's 28 U.S.C. § 2255 Petition.

On August 12, 2019, Mr. Baslan filed a petition pursuant to 28 U.S.C. § 2255. Two weeks later, the Court directed the government to respond, which it did on December 20, 2019. On April 27, 2020, Mr. Baslan submitted a reply, but also asked the Court to stay the proceedings until the restrictions imposed on him by the Bureau of Prisons due to the Covid-19 pandemic were eased. So far, the Court has not responded to Mr. Baslan's request, and it has not issued a ruling on the petition.

In the meantime, Mr. Baslan retained me to assist him in prosecuting his § 2255 Petition. I have reviewed the record and believe there are legitimate legal arguments to be pursued. Accordingly, given that a decision remains pending, I respectfully request permission to file a supplemental brief in support of Mr. Baslan's petition, and to do so on or before October 22, 2020.

Thank you for your consideration.

Respectfully submitted,

/s/

Florian Miedel
Attorney for Bebars Baslan

Cc: AUSA Andrew Wang (by ECF)